

**United States District Court for the
Western District of Tennessee, Western Division**

Shirley Cohen and Hannah Cohen
Plaintiffs

v.

TSA, MSCAA, and MIAPD
Defendants

Civil Action No.: 2:16-cv-02529

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THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
W/D OF TN, MEMPHIS

Sai¹
Intervenor

Motion for leave to intervene²

In accordance with F. R. Civ. P. 24(a)(2) and (b)(1), Intervenor respectfully moves for leave to intervene in this case, for the limited purpose of asserting First Amendment and common law Intervenor's rights to access judicial records, and to request that this Court issue an order to show cause re the perjury of the Defendants' records custodian, as described in the attached motion.

Every person has a right to access such records, which the attached motion seeks to vindicate. Intervenor does not assert any interest in the merits of this case; only in access to the records thereof. See EEOC v National Children's Center, Inc., 146 F. 3d 1042, 1046-48 (D.C. Cir. 1998), and Globe Newspaper Co. v. Superior Ct., Norfolk Cty., 457 U.S. 596, 609 n. 25 (1982).

Intervenor is an advocate and member of the press, with a focus on governmental accountability, civil rights and disability rights. Intervenor, in journalistic capacity, has regularly obtained

¹ "Sai" is Intervenor's full legal name.

² Having found nothing applicable in this Court's local rules, Intervenor contacted this Court's case manager, Chris Sowell, to ask about any fees, local rules, or standing orders affecting *pro se* motions to intervene. Mr. Sowell stated that he was not aware of any applicable orders or fees. Therefore, this motion is filed without payment of any fee, according to F. R. Civ. P. 24.



information under FOIA and other laws in order to inform the public about TSA's activities, *see* <https://s.ai/foia/#tsa>, including in this case in particular, *see* <https://s.ai/tsa/cohen/>.

Intervenor attempted to confer with all parties in this case, by emailing their counsel of record (as listed on the docket) to determine their position with respect to both the motion to intervene and the attached motion to compel, but has received no response.

Intervenor would not have brought this motion had Defendants voluntarily un-redacted the contested filing, or had Plaintiff's counsel stated that Plaintiff would bring a similar motion.

Respectfully submitted,
Sai, *intervenor pro se*
legal@s.ai

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500 Westover Dr. #4514, Sanford, NC 27330

Certificate of service

I, Sai, hereby certify that I have served all attorneys of record listed on the docket in this case, listed below, a copy of this paper via email on September 8, 2016; and that they will be also served by CM/ECF upon the Clerk's entry of this paper on the docket.

For Plaintiffs:

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William G. Hardwick, II	wgh38119@yahoo.com

For Defendants MSCAA and MIAPD:

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James L. Cresswell, Jr.	jcresswell@pf-law.net
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For Defendant TSA:

David Brackstone	david.brackstone@usdoj.gov
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